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April 12, 2019

Ms. Jocelyn Boyd
 Chief Clerk and Administrator
 South Carolina Public Service Commission
 Synergy Business Park, The Saluda Building
 101 Executive Center Drive
 Columbia SC 29210

**Re: Application of City Communications, Incorporated for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Exchange, Exchange Access and Interexchange Telecommunications Services in the State of South Carolina, and for Alternative and Flexible Regulation
 Docket No. 2019-100-C**

Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition (the "Coalition"), a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service all parties of record will receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Sincerely,

Burr & Forman LLP



Margaret M. Fox

MMF:khh
 Enclosure: as stated

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2019-100-C

Re: Application of City Communications,)
 Incorporated for a Certificate of Public)
 Convenience and Necessity to Provide)
 Resold and Facilities-Based Local)
 Exchange, Exchange Access and)
 Interexchange Telecommunications)
 Services in the State of South Carolina,)
 and for Alternative and Flexible)
 Regulation)

PETITION TO INTERVENE

In response to the Commission's Notice of Filing of the Application of City Communications, Inc. ("City Communications") for a Certificate of Public Convenience and Necessity to provide local exchange and interexchange (including exchange access) telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not


appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
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By: 
Attorneys for Intervenor South Carolina
Telephone Coalition

April 12, 2019

Columbia, South Carolina

EXHIBIT A

South Carolina Telephone Coalition Member Companies
for Purposes of Local Service Stipulation

Chesnee Telephone Company
Chester Telephone Company, d/b/a TruVista
Comporium, Inc. (f/k/a Rock Hill Telephone Company)
Farmers Telephone Cooperative, Inc.
Ft. Mill Telephone Company, d/b/a Comporium
Home Telephone ILEC, LLC d/b/a Home Telecom
Lancaster Telephone Company, d/b/a Comporium
Lockhart Telephone Company, d/b/a TruVista
McClellanville Telephone Company (TDS)
Norway Telephone Company (TDS)
Palmetto Rural Telephone Cooperative, Inc.
Piedmont Rural Telephone Cooperative, Inc.
PBT Telecom, d/b/a Comporium
Ridgeway Telephone Company, d/b/a TruVista
St. Stephen Telephone Company (TDS)
West Carolina Rural Telephone Cooperative, Inc.
Williston Telephone Company (TDS)

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Interexchange Telecommunications)
Services in the State of South Carolina, and)
for Alternative and Flexible Regulation)

CERTIFICATE OF SERVICE

I, Kathy Handrock, Paralegal for Burr & Forman LLP, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

Robert D. Coble, Esquire
Nexsen Pruet Adams Kleemeier, LLC
PO Drawer 2426
Columbia, SC 29202

C. Lessie Hammonds, Esquire
Alexander W. Knowles, Esquire
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Kathy Handrock, Paralegal
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April 12, 2019

Columbia, South Carolina